

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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NEW YORKERS FOR RELIGIOUS LIBERTY, INC.,	:	
et al.,	:	
	:	Case No. 1:22-cv-00752
Plaintiffs,	:	
	:	DECLARATION OF BARRY
- against -	:	BLACK IN SUPPORT OF
	:	PLAINTIFF’S MOTION FOR
THE CITY OF NEW YORK et al.,	:	PRELIMINARY INJUNCTION
	:	
Defendants.	:	
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BARRY BLACK, an attorney admitted to practice before this Court, declares under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true:

1. I am an attorney for the Plaintiffs and am fully familiar with the facts and circumstances of this case.
2. I respectfully submit this Declaration in support of Plaintiffs' Motion for a Preliminary Injunction, and fully incorporate all pleadings filed in support of this motion, including the Memorandum of Law submitted herewith.
3. The attached exhibits are true and accurate copies of what they purport to be.
4. In their moving papers, Plaintiffs assert that they will suffer irreparable harm without a preliminary injunction and that the religious accommodation process was discriminatory. As these facts are contested, Plaintiffs ask to present testimony by themselves and others facing irreparable harm and also offer the following declarations and evidence:

- a. Curtis Cutler was a sanitation worker with the New York City Department of Sanitation. Attached hereto as Exhibit 1 is the sworn Declaration of Curtis Cutler.

b. Sabina Kolenovic was a teacher with the New York City Department of Education.

Attached hereto as Exhibit 2 is the Declaration of Sabina Kolenovic.

c. Krista O'Dea was a rescue medic with the Fire Department of New York. Attached hereto as Exhibit 3 is the Declaration of Krista O'Dea.

Dated: March 8, 2022

New York, New York

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Barry Black', is written over a horizontal line.

Barry Black
Nelson Madden Black LLP
Attorney for Plaintiffs and the Class
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